

# **EXHIBIT D**

WOLLMUTH MAHER & DEUTSCH LLP  
500 Fifth Avenue  
New York, New York 10110  
Telephone: (212) 382-3300  
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William A. Maher  
Paul R. DeFilippo  
James N. Lawlor

Special Litigation Counsel  
for the Debtors and Debtors-in-Possession

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

_____	x	
In re:	:	Chapter 11
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i>	:	Case No. 08-13555 (JMP)
Debtors.	:	
_____	x	

**AMENDED THIRD MONTHLY FEE APPLICATION OF  
WOLLMUTH MAHER & DEUTSCH LLP FOR COMPENSATION OF  
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS  
SPECIAL COUNSEL TO THE DEBTORS AND DEBTORS-IN-  
POSSESSION**

Name of Applicant:	Wollmuth Maher & Deutsch LLP
Authorized to Provide Professional Services to:	Debtors and Debtors-in-Possession
Date of Retention:	Order Entered October 20, 2010 [Docket No. 11872] <i>Nunc Pro Tunc</i> to September 9, 2010
Compensation Period:	December 1, 2010 to December 31, 2010
Amount of Compensation Sought:	\$98,493.50
Amount of Expense Reimbursement Sought:	\$4,222.54
80% of Compensation Sought as Actual, Reasonable and	

Necessary: \$78,794.80

This is a: ☒ Monthly ☐ Interim ☐ Final Application

This is Wollmuth Maher & Deutsch LLP's amended third monthly fee application in this case.

**Timekeeper Summary**

<b>Timekeeper</b>	<b>Position</b>	<b>Year of Admission</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Paul R. DeFilippo	Senior Partner	Area of Expertise: Litigation, Bankruptcy. Member of the New York Bar (1999), New Jersey Bar (1978). Joined the firm in 2002.	\$615.00	1.00	615.00
William A. Maher	Senior Partner	Area of Expertise: Litigation. Member of the New York Bar (1986), New Jersey Bar (1998). Joined the firm in 1998.	595.00	13.50	8,032.50
Sandip Bhattacharji	Partner	Area of Expertise: Litigation. Member of the New York Bar (1991). Joined the firm in 2006.	550.00	12.40	6,820.00
William F. Dahill	Partner	Area of Expertise: Litigation. Member of the New York Bar (1992). Joined the firm in 1998.	550.00	16.10	8,855.00
James N. Lawlor	Partner	Area of Expertise: Litigation, Bankruptcy. Member of the New York Bar (1993), New Jersey Bar (1992). Joined the firm in 2002.	550.00	34.30	18,865.00
Randall Rainer	Partner	Area of Expertise: Litigation. Member of the New York Bar (1995). Joined the firm in 2000.	550.00	12.80	7,040.00
Michael C. Ledley	Counsel	Area of Expertise: Litigation. Member of the New York Bar (2991). Joined the firm in 2010.	495.00	36.80	18,216.00
Adam M. Bialek	Associate	Area of Expertise: Litigation. Member of the New York Bar (2002), New Jersey Bar (2002).	395.00	48.00	18,960.00

		Joined the firm in 2005.			
Alexis Castillo	Associate	Area of Expertise: Litigation. Member of the New York Bar (2010). Joined the firm in 2009.	250.00	27.80	6,950.00
John D. Giampolo	Associate	Area of Expertise: Litigation, Bankruptcy. Member of the New York Bar (2005), New Jersey Bar (2005). Joined the firm in 2010.	350.00	1.30	455.00
Matthew Bost	Paralegal		110.00	14.90	1,639.00
Nick Green	Paralegal		110.00	1.20	132.00
Kyle J. Dumas	Paralegal		110.00	0.80	88.00
Martina Frederick	Paralegal		110.00	8.20	902.00
Katia Sperduto	Paralegal		120.00	7.70	924.00
			<b>Total</b>	<b>236.80</b>	<b>\$98,493.50</b>

**SUMMARY OF SERVICES**

<b>SERVICE</b>	<b>HOURS</b>	<b>VALUE</b>
Claims Administration and Objections	1.30	726.50
Fee/Employment Application	6.80	3,560.00
Avoidance Action Litigation	228.70	94,207.00
<b>Subtotal:</b>	<b>236.80</b>	<b>\$98,493.50</b>
<b>Less ½ Travel Time</b>	<b>0.00</b>	<b>(0.00)</b>
<b>TOTAL SERVICES:</b>	<b>236.80</b>	<b>\$98,493.50</b>

**SUMMARY OF DISBURSEMENTS**

<b>DISBURSEMENTS</b>	<b>VALUE</b>
1. Duplicating (@ \$0.10 per page)	118.30
2. Postage Expense	7.85
3. Facsimile (@ \$1.00 per page)	12.00
4. Legal Research (Lexis Nexis/Pacer)	1,105.55
5. Transportation – Elite Car Service	1,434.16
6. Working Dinner	93.27
7. Local Travel	14.00
8. Telephone Service	1.24
9. Federal Express	123.57
10. ALM Media	12.60
11. Lawyer Service – Demovsky	800.00
12. Filing Fee	500.00
<b>TOTAL DISBURSEMENTS:</b>	<b>4,222.54</b>

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Telephone: (212) 382-3300  
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Special Counsel for the Debtors and  
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**UNITED STATES BANKRUPTCY COURT  
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In re:	:	Chapter 11
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i>	:	Case No. 08-13555 (JMP)
Debtors.	:	
_____	x	

**AMENDED THIRD MONTHLY FEE APPLICATION OF WOLLMUTH  
MAHER & DEUTSCH LLP FOR COMPENSATION OF SERVICES  
RENDERED AND REIMBURSEMENT OF EXPENSES AS SPECIAL  
COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION**

By this application (the "Application"), pursuant to sections 330 and 331 of title 11 of the United States Code (the "Bankruptcy Code"), and Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), Wollmuth Maher & Deutsch LLP ("Wollmuth" or the "Firm") hereby seeks reasonable compensation in the above-captioned cases (the "Debtors"), for professional legal services rendered as counsel to the Debtors in the amount of \$98,493.50, together with reimbursement for actual and necessary expenses incurred in the amount of \$4,222.54 for the period commencing December 1, 2010 through and including December 31, 2010 (the "Compensation Period"). Pursuant to Third Amended Order Pursuant to Sections 105(a) and 331 of the Bankruptcy Code and Bankruptcy Rule 2016(a) Establishing Procedures for Interim Monthly Compensation and Reimbursement of Expenses of Professionals dated June



25, 2009 [Docket No. 4165] establishing procedures for interim compensation and reimbursement of professionals (the "Compensation Order"), Wollmuth seeks reimbursement of 80% of its total reasonable and necessary fees incurred, in the amount of \$78,794.80, together with 100% reimbursement for actual and necessary expenses incurred in the amount of \$4,222.54, for the Compensation Period. In support of this Application, Wollmuth represents as follows:

### **BACKGROUND**

1. Commencing on September 15, 2008 and periodically thereafter (as applicable, the "Commencement Date"), LBHI and certain of its subsidiaries commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code. The Debtors' chapter 11 cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"). The Debtors are authorized to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. On September 17, 2008, the United States Trustee for the Southern District of New York (the "U.S. Trustee") appointed the statutory committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code (the "Creditors' Committee").

3. On September 19, 2008, a proceeding was commenced under the Securities Investor Protection Act of 1970 ("SIPA") with respect to Lehman Brothers Inc. ("LBI"). A trustee appointed under SIPA is administering LBI's estate.

4. On January 19, 2009, the U.S. Trustee appointed Anton R. Valukas as examiner in the above-captioned chapter 11 cases (the "Examiner") and by order, dated January 20, 2009 [Docket No. 2583] the Court approved the U.S. Trustee's appointment of the Examiner. The

Examiner issued a report of his investigation pursuant to section 1106 of the Bankruptcy Code on March 11, 2010 [Docket No. 7531].

5. On April 14, 2010, the Debtors filed a revised joint chapter 11 plan and disclosure statement [Docket Nos. 8330 and 8332].

6. On October 1, 2010, the Debtors filed an application [Docket No. 11761] to retain Wollmuth to serve as conflicts and special litigation counsel, in connection with the prosecution of certain avoidance actions brought pursuant to sections 547 and 548 of the Bankruptcy Code and other related claims, and such other litigation related matters as may be assigned by the Debtors (together, the "Representative Matters").

7. On October 28, 2010, this Court entered an Order that approved Wollmuth's retention as counsel to the Debtors [Docket No. 11872] (the "Retention Order") *nunc pro tunc* to September 9, 2010.

#### **JURISDICTION AND VENUE**

8. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). The statutory predicates for the relief requested herein are sections 330 and 331 of the Bankruptcy Code.

#### **RELIEF REQUESTED**

9. Wollmuth submits this Application in accordance with the Compensation Order. All services for which Wollmuth requests compensation were performed for, or on behalf of, the Debtors. In connection with the professional services rendered, by this Application, Wollmuth seeks compensation in the amount of \$78,794.80 (80% of the actual compensation of \$98,493.50) and expense reimbursement of \$4,222.54. Attached hereto as Exhibit A is a detailed

explication of hours spent rendering legal services to the Debtors supporting Wollmuth's request of \$98,493.50 in compensation for fees incurred during the Compensation Period. Attached hereto as Exhibit B is a detailed list of disbursements made by Wollmuth supporting its request of \$4,222.54 in expense reimbursement for the Compensation Period.<sup>1</sup>

10. Given the nature and value of the services that Wollmuth provided to the Debtors as described herein, the amounts sought under this Application are fair and reasonable under section 330 of the Bankruptcy Code given the complexity of this case; the time expended by attorneys and professionals; the nature and extent of the services rendered; the value of such services; and the costs of comparable services other than in a case under the Bankruptcy Code.

11. Wollmuth has received no payment and no promises for payment from any source for services rendered in connection with this case other than those in accordance with the Bankruptcy Rules. There is no agreement or understanding between Wollmuth and any other person (other than members of Wollmuth) for the sharing of compensation to be received for the services rendered in this case.

#### **SUMMARY OF SERVICES RENDERED**

12. In rendering services to the Debtors during its chapter 11 case, the Firm's legal team has been composed primarily of professionals with extensive experience in bankruptcy and in the applicable legal practice areas for the matters for which the Firm was retained. These professionals have coordinated assignments, both internally and with the Debtors' general counsel, Weil, Gotshal & Manges, LLP, and conflicts counsel, Curtis Mallet-Prevost, Colt & Mosle, LLP, to maximize efficiency and avoid any duplication of effort.

13. All services were rendered by Wollmuth at the request of the Debtors and were

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<sup>1</sup> As indicated on Exhibit B, the foregoing amounts are calculated in consideration of a credit toward an over-charge from a previous invoice in the amount of \$809.73.

time the services were rendered. The compensation sought by Wollmuth in this Application is comparable to or less than customary compensation sought by comparably skilled professionals in cases under the Bankruptcy Code. In addition, the compensation sought is based on Wollmuth's standard and usual rates for similar services in representations other than under the Bankruptcy Code.

14. The services provided by Wollmuth during the Compensation Period were rendered to ensure no unnecessary duplication and are grouped into the billing categories set forth in Exhibit A. The attorneys and professionals who rendered services relating to each category are identified in the above attachment and summaries of the hours and fees of each for the Compensation Period and the total compensation by billing category are included in Exhibit A. Because detailed invoices of the services rendered by Wollmuth are attached as Exhibit A, the following descriptions will describe only in summary form the services performed by Wollmuth.

**A. SPV Payment Priority Litigation - 001**

15. The largest portion of the Firm's services during the Compensation Period were provided in connection with the continued prosecution of an adversary proceeding (i) to prevent certain unenforceable *ipso facto* clauses from improperly modifying the right of Lehman Brothers Special Financing Inc. ("LBSF") to priority of payment of more than \$3 billion dollars under certain transaction documents related to credit default swap agreements based solely upon the filing of LBSF and its ultimate parent, LBHI, for bankruptcy; and (ii) to recover funds that were improperly paid to noteholders.<sup>1</sup> On September 9, 2010, the Firm was formally asked to

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<sup>1</sup> The Firm filed an adversary encaptioned Lehman Bros. Spec. Fin., Inc. v. Bank of America, N.A., Adv. Proc. No. 10-03547 (JMP).

serve as counsel as a result of conflicts of interest identified by Weil, Gotshal and Curis Mallet-Prevost firms.

16. During the Compensation Period, the Firm prepared expedited discovery requests to named defendants in an effort to quickly identify the beneficial noteholders that may need to be added as additional defendants in the litigation. The Firm also focused significant time and effort in serving process on the multiple named defendants, both within and without the United States. These services included coordinating with multiple process services in multiple jurisdictions and addressers discovery issues raised by defendants.

17. The Firm also continued to monitor important developments in the Lehman proceeding that had implications for the litigation, such as the Debtors' notice involving derivative counter party ADR procedures and the objections thereto.

18. Members of the Firm also researched and addressed critical legal and factual issues that arose in the litigation during the Compensation Period.

19. The Firm kept in constant contact with the Debtors' management team and other counsel to coordinate efforts and to maintain a common legal position with various related litigations.

**B. Derivative Close Out Claims - 002**

20. Shortly after the Firm began preparing the adversary complaint discussed above, as a result of yet another conflict, the Firm was asked to render services related to disputed unsecured claims of approximately \$2.5 billion filed by three (3) Goldman Sachs entities. The unsecured claims arose from the termination and close out of approximately 57,000 derivative transactions under certain ISDA Master Agreements. The Firm continues to support the Debtors' efforts to resolve the claims in a structured, but informal process.

**C. Koch Avoidance Litigation - 003**

21. The Firm was asked to assist in the potential filing of an avoidance action involving certain Koch entities. While the Debtors had previously reached an agreement with the Koch entities to toll the statute of limitations, the Firm was advised that the agreement may be terminated shortly by the Koch entities. Accordingly, the Firm began on an expedited basis to prepare should litigation have to be filed to preserve the estates' rights.

22. In addition, the Firm assisted the Debtors in preparing for the potential that the Koch matters be addressed in the Debtors' existing alternative dispute resolution ("ADR") procedures or by a modified form of same. Accordingly, members of the Firm worked closely with the Debtor's management and other counsel to coordinate both a potential amendment of the tolling agreement with the Koch entities and the potential noticing and prosecution of an ADR proceeding. The Firm also worked to address potential discovery and damages issues raised by the Koch entities. In addition, the Committee's counsel presented the Debtors with comments to the proposed ADR notices, which the Firm addressed.

**C. CEAGO Avoidance Litigation - 004**

23. Another significant portion of the Firm's services during the Compensation Period were provided in connection the filing of an adversary proceeding to prevent certain unenforceable *ipso facto* clauses from improperly modifying the right of LBSF to priority of payment of more than approximately \$150 million in collateral in connection with a collateralized debt obligation transaction called Ceago ABS CDO 2007-1 ("Ceago Transaction" or the "Ceago Note").<sup>2</sup> The Debtors previously had entered into a tolling agreement with the potential defendants as to the Ceago Transaction. However, the tolling agreement had been

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<sup>2</sup> The Firm filed an adversary encaptioned Lehman Bros. Spec. Fin., Inc. v. Bank of America, N.A., Adv. Proc. No. 10-04331 (JMP).

terminated by the non-Debtor parties and was to expire on or about November 30, 2010. The Firm was formally asked to serve as counsel as a result of conflicts of interest identified by Weil, Gotshal and Curis Mallet-Prevost firms.

24. The Debtors advised the Firm that it was critical that the complaint in the above matter be filed no later than November 29, 2010, after which the two-year statute of limitations under 11 U.S.C. § 546 may expire for any Chapter 5 avoidance actions needing to be brought in the Chapter 11 proceedings (which limitations period had been extended by the tolling agreement referenced above). Accordingly, the Firm filed a timely complaint.

25. In addition to the filing of the Ceago Transaction complaint, the Firm was also asked to simultaneously prepare and file a motion to extend the current stay of discovery that already applied to similar litigations to the Ceago litigation. In order to accomplish the obtaining of a stay, the Firm spent significant time communicating with counsel for Ceago and the Ad Hoc Creditor Group on the ADR procedures during the compensation period.

#### **COMPENSATION REQUESTED**

26. For the Compensation Period, Wollmuth seeks compensation in the amount of \$78,794.80 (80% of the total fees of \$98,493.50 incurred during the Compensation Period) in connection with the professional services summarized above and detailed in Exhibit A, and total costs and expenses in the amount of \$4,222.54 as detailed in Exhibit B.

27. It is Wollmuth's policy to charge its clients in all areas of practice the amounts incurred by Wollmuth for identifiable, non-overhead expenses incurred in connection with the client's case that would not have been incurred except for representation of that particular client. Examples of such expenses are postage, overnight mail, courier delivery, computer assisted legal research, photocopying, outgoing facsimile transmissions, transportation and long-distance

telephone.

28. Wollmuth represents as follows with regard to its charges for actual and necessary costs and expenses during the Compensation Period:

- (a) Long-distance telephone charges are billed at actual costs;
- (b) Photocopy charges are \$.10 per page;
- (c) Incoming facsimiles are not billed. Outgoing facsimiles are billed at the rate of \$1.00 per page; and,
- (d) Outside information services, including computer assisted legal research and PACER, are billed at actual costs.
- (e) car services are capped at \$100.00 per hour and only permitted for travel after 8:00 p.m.
- (f) meals charges are billed at actual cost but are capped at \$20 per person and are only charged for meals after normal business hours or on weekends

29. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amounts requested for compensation and expense reimbursement are fair and reasonable given: (a) the complexity of these cases; (b) the time expended; (c) the nature and extent of the services rendered; (d) the value of such services; and (e) the cost of comparable services other than in a case under the Bankruptcy Code.

30. The undersigned has reviewed the requirements of Local Rule 2016-2, and certifies that this Application and the Exhibits attached hereto comply therewith and a copy of this Application has been sent to the parties set forth in the Compensation Order.

*[Remainder of page intentionally left blank]*



WHEREFORE, the Firm asks the Court to approve for the current Compensation Period the sum of \$98,493.50 representing the total compensation for professional services rendered, 80% or \$78,794.80, of which is to be currently paid, and the sum of \$4,222.54 for reimbursement of actual and necessary costs and expenses incurred by it in these cases from December 1, 2010 through December 31, 2010.

Respectfully submitted,

By: /s/ James N. Lawlor

William A. Maher

Paul R DeFilippo

James N. Lawlor

WOLLMUTH MAHER & DEUTSCH LLP

500 Fifth Avenue

New York, New York 10110

Telephone: (212) 382-3300

Facsimile: (212) 382-0050

Special Counsel for the

Debtors and Debtors-in-Possession

Dated: New York, New York  
March 16, 2011

# **EXHIBIT A**

**Wollmuth Maher & Deutsch**

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New York, New York 10110

T: 212-382-3300

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One Gateway Center, 9th Fl.  
Newark, New Jersey 07102

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Lehman Estate

March 14, 2011

File #: 4715-001

Inv #: 20364

**Attention:**

**RE:** SPV Avoidance Litigation

**SUMMARY BY TASK**

<b>Task</b>	<b>Hours</b>	<b>Amount</b>
C05 Claims Administration and Objections	1.30	726.50
C07 Fee/Employment Applications	6.80	3,560.00
C11 Avoidance Action Litigation	228.70	94,207.00
<b>Total</b>	<b>236.80</b>	<b>\$98,493.50</b>
<b>Grand Total</b>	<b>236.80</b>	<b>\$98,493.50</b>

**SUMMARY BY TIMEKEEPER**

<b>Timekeeper</b>	<b>Category</b>	<b>Rate</b>	<b>This Invoice</b>	
			<b>Hours</b>	<b>Amount</b>
William A. Maher	Senior Partner	595.00	13.50	8,032.50
Paul R. DeFilippo	Senior Partner	615.00	1.00	615.00
Sandip Bhattacharji	Partner	550.00	12.40	6,820.00
Randall R. Rainer	Partner	550.00	12.80	7,040.00
James N. Lawlor	Partner	550.00	34.30	18,865.00
William F. Dahill	Partner	550.00	16.10	8,855.00
Adam M. Bialek	Junior Partner	395.00	48.00	18,960.00
Michael C. Ledley	Junior Partner	495.00	36.80	18,216.00
John D. Giampolo	Associate	350.00	1.30	455.00
Alexis Castillo	Associate	250.00	27.80	6,950.00
Matthew Bost	Paralegal	110.00	14.90	1,639.00
Nick Green	Paralegal	110.00	1.20	132.00

Invoice #: 20364

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March

Martina Frederick	Paralegal	110.00	8.20	902.00
Kyle J. Dumas	Paralegal	110.00	0.80	88.00
Katia Sperduto	Paralegal	120.00	7.70	924.00

**Total****236.80 \$98,493.50****DISBURSEMENT SUMMARY**

ALM	ALM Invoice #	12.60
dem	Demovsky Lawyer Service Inv.#	800.00
Dnr	Working Dinner	93.27
Elit	Elite (Car Service) Inv. #	1,434.16
FDX	Federal Express Inv #	123.57
ff	Filing Fee	500.00
fx	Facsimiles	12.00
lex	Lexis Nexis Inv. #	1,096.35
lo	Local Travel	14.00
PAC	Pacer Service Center Inv#	9.20
ph	Photocopies	24.60
phx	Photocopy Expense	93.70
psx	Postage Expense	7.85
ptc	Pae Tec Comm. Inv.#	1.24
Total Disbursements		\$4,222.54

Invoice #: 20364

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Date	Description	Hours	Amount	Lawyer
MATTER:	4715-001			
RE:	SPV Avoidance Litigation			
Dec-01-10	Avoidance Action Litigation: T/c from B. Trust of Mayer Brown	0.10	59.50	WAM
	Avoidance Action Litigation: O/c w/RRR re: status and next steps	0.20	119.00	WAM
	Avoidance Action Litigation: Conf call w/Trust, RRR and MCL re: Debtors' new motion for ADR proceedings on SPV matters and CIBC request for carve-out	0.20	119.00	WAM
	Avoidance Action Litigation: O/c w/RRR and MCL re: next steps re: Debtors' new motion for ADR proceedings on SPV matters and CIBC request for carve-out	0.10	59.50	WAM
	Avoidance Action Litigation: Review email from Ziegler of Mayer Brown re Debtors' new motion for ADR proceedings on SPV matters and CIBC request for carve-out, and forward to Weil w/cover note	0.20	119.00	WAM
	Avoidance Action Litigation; Conf call w/B. Trust (Mayer Brown), WAM, MCL re: Trust's query re: impact of recent ADR motion on CIBC ADR carve out	0.10	55.00	RRR
	Fee/Employment Applications; Emails from WAM re: status of monthly invoice	0.10	55.00	JNL
	Avoidance Action Litigation; Attn to next steps for service	0.30	165.00	WFD
	Avoidance Action Litigation; O/c w/AMB	0.20	110.00	WFD
	Avoidance Action Litigation; Review email from S. Garabato, AHC and C. Fallon re: service of discovery by EPIQ and affidavit of service	0.10	39.50	AMB
	Avoidance Action Litigation; O/c w/AHC re: MA process server	0.10	39.50	AMB
	Avoidance Action Litigation; Review email from AHC to MA process server re: affidavit of service	0.10	39.50	AMB
	Avoidance Action Litigation; Review email from AHC to MD process server re: affidavit of service	0.10	39.50	AMB
	Avoidance Action Litigation; T/c w/WAM, RRR, L. Fife re: Ad Hoc Creditor Group inquiry	0.10	49.50	MCL
	Avoidance Action Litigation; follow up on obtaining out-of-state certificates of service for filings of pleadings	0.50	125.00	AHC

Invoice #: 20364

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	Avoidance Action Litigation; create and revise chart for keeping track of serving pleadings and discovery	0.50	125.00	AHC
	Avoidance Action Litigation; edits to certificate of service to US Bank National Association	0.50	125.00	AHC
	Avoidance Action Litigation; review affidavits of service by Epiq and the out of state process servers	0.40	100.00	AHC
	Avoidance Action Litigation: Create updated version of "Return of Private Process Server" form, save same on the system and email same to AHC per her request	0.80	96.00	KLS
Dec-02-10	Avoidance Action Litigation: Emails to/from Mayer Brown re: CIBC request for carve-out from ADR procedures	0.10	59.50	WAM
	Avoidance Action Litigation: Emails to/from Weil re: CIBC request for carve-out from ADR procedures	0.10	59.50	WAM
	Avoidance Action Litigation: T/cs w/RRR re: emails from Mayer Brown and re: CIBC request for carve-out from ADR procedures, and follow-up with client	0.20	119.00	WAM
	Avoidance Action Litigation: Review MCL email re: substance of recent motion re: ADR procedures for derivatives contracts, and briefing review recent motion	0.40	238.00	WAM
	Avoidance Action Litigation; Review proposed order; review notice of settlement of order	0.30	165.00	JNL
	Avoidance Action Litigation; Review multiple emails re: proposed ADR procedures impact on claims issues	1.00	550.00	JNL
	Avoidance Action Litigation; O/c w/AMB re: next round of service	0.40	220.00	WFD
	Avoidance Action Litigation; Update to do list	0.70	276.50	AMB
	Avoidance Action Litigation; Update spreadsheet re: service	0.50	197.50	AMB
	Avoidance Action Litigation; Review emails from MCL and RRR re: Pyxis deal	0.20	79.00	AMB
	Avoidance Action Litigation; Emails to/from AHC re: Affidavits of Service	0.10	39.50	AMB
	Avoidance Action Litigation; Review docs for addresses for Issuers	1.00	395.00	AMB
	Avoidance Action Litigation; Review motion for entry of SPV Derivative Counter party ADR Procedures.	1.00	495.00	MCL
	Avoidance Action Litigation; Draft email motion to WMD team re: motion for entry of	0.60	297.00	MCL

Invoice #: 20364

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	SPV Derivative Counter party ADR Procedures		
	Avoidance Action Litigation; emails and calls w/J. Carusi re: US Bank National Association affidavit of service of pleadings	0.20	50.00 AHC
	Avoidance Action Litigation; o/cs w/AMB re: affidavits of service of pleadings	0.10	25.00 AHC
	Avoidance Action Litigation; update of chart of service of discovery for WFD review	0.40	100.00 AHC
Dec-03-10	Avoidance Action Litigation; Multiple emails from/to RRR re: CIBC counsel issues regarding ADR implications in Pyxis matter	0.40	220.00 JNL
	Avoidance Action Litigation; Review and respond to emails from RRR re: arranging Conf. Call on Lehman matters	0.70	385.00 JNL
	Avoidance Action Litigation; Begin review key docs	0.20	110.00 WFD
	Avoidance Action Litigation; Emails to/from AHC re: filing Affidavits of service	0.30	118.50 AMB
	Avoidance Action Litigation; Coordinate service of Amended Complaint on issuers	5.80	2,291.00 AMB
	Avoidance Action Litigation; review certificates of service and o/cs w/AMB re: same	0.40	100.00 AHC
Dec-06-10	Avoidance Action Litigation: Review recent emails re: Pyxis transaction and Mayer Brown request for CIBC carve-out of ADR proceedings	0.20	119.00 WAM
	Avoidance Action Litigation: T/c from Mayer Brown, o/c w/RRR re: same and review emails between Mayer Brown and RRR re: request for CIBC carve-out of ADR proceedings	0.30	178.50 WAM
	Avoidance Action Litigation; Locate agent for service of process information	0.60	330.00 SCB
	Avoidance Action Litigation; Attn to emails/filings re: Mayer Brown inquiry re: CIBS carve-out re: pending motion re: ADR procedures re: SPVs and emails w/L. McMurray re: same	0.60	330.00 RRR
	Avoidance Action Litigation; Attn to scheduling call w/Ad Hoc Group of Lehman Creditors re: Ceago CDO	0.50	275.00 RRR
	Avoidance Action Litigation; O/cs w/AMB re: service on issuers	0.10	55.00 WFD
	Avoidance Action Litigation; Review emails from RRR and MCL re: Pyxis deal; t/c and email w/Process server from MD re: service of process on Wells Fargo; emails and t/cs w/EPIQ re: service of discovery and affidavits of service	0.10	39.50 AMB

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Dec-07-10	Avoidance Action Litigation; Internal email exchange re: SPV Derivative ADR motion and Pyxis	0.30	148.50	MCL
	Avoidance Action Litigation; o/c w/AMB re: filing certificates of service	0.10	25.00	AHC
	Avoidance Action Litigation; T/c w/process server re: delivery of Affidavits of Service; check same for accuracy, and scan and save on system	0.30	33.00	MEB
	Avoidance Action Litigation: T/c from Trust of Mayer Brown re: CIBC carve-out and email to RRR re: same	0.10	59.50	WAM
	Avoidance Action Litigation: Review emails between Weil, Lehman and WMD re: CIBC carve-out	0.20	119.00	WAM
	Avoidance Action Litigation: Review emails between Mayer Brown and RRR re: extension of CIBC time for objections	0.10	59.50	WAM
	Avoidance Action Litigation: Review emails from WMD team re: status of service of expedited discovery and next steps	0.20	119.00	WAM
	Avoidance Action Litigation; Conf w/AMB, WHD re: agent for service of process; locate information for selected transactions	1.50	825.00	SCB
	Avoidance Action Litigation; T/cs w/B. Trust (Mayer Brown), S. Collings (Weil) re: CIBC request re: pending motion re: ADR procedures for SPVs	0.50	275.00	RRR
	Avoidance Action Litigation; Review/respond to internal emails re: service issues in Distributed SPV Avoidance class action; o/c w/AMB re: same and email to L. McMurray re: same	0.50	275.00	RRR
	Avoidance Action Litigation; Further attn to August 2009 ADR carve-out letter w/Mayer Brown re: Pyxis; email to clients, Curtis-Mallet re: implications of same for current carve-out request from Mayer Brown	0.30	165.00	RRR
	Fee/Employment Applications; Multiple emails to/from JDG and WAM re: Fee committee changes and impact on invoices, Emails from/to L. McMurray and RRR re: ICIBC Pyxis carveout from ADR	0.40	220.00	JNL
	Avoidance Action Litigation; Review issuer docs re: agent for service	0.30	165.00	WFD
	Avoidance Action Litigation; Prep status, strategy emails (2x)	0.40	220.00	WFD
	Avoidance Action Litigation; O/c w/AMB, SCB re: service issues	0.20	110.00	WFD



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Avoidance Action Litigation; O/c w/MCL re: service of Cayman based Issuers	0.20	79.00	AMB
Avoidance Action Litigation; Edit doc demands and notice of depo for Issuers	0.40	158.00	AMB
Avoidance Action Litigation; Locate final addresses of Issuers	1.00	395.00	AMB
Avoidance Action Litigation; Coordination of service of process on Issuers	1.00	395.00	AMB
Avoidance Action Litigation; Review emails from J. Brizuela re: Vox deal docs	0.20	79.00	AMB
Avoidance Action Litigation; Review email from RRR to L. McMurray re: deal docs from Vox deal	0.10	39.50	AMB
Avoidance Action Litigation; Review email from AHC and C. Fallon re: change to affidavit of service re: discovery on Trustees	0.10	39.50	AMB
Avoidance Action Litigation; Emails to/from WFD and RRR re: status of discovery	0.50	197.50	AMB
Avoidance Action Litigation; O/c w/SCB and WFD re: service of Cayman based Issuers	0.30	118.50	AMB
Avoidance Action Litigation; O/c w/SCB re: service of Cayman based Issuers	0.20	79.00	AMB
Avoidance Action Litigation; O/cs w/AMB re: serving discovery	0.30	148.50	MCL
Fee/Employment Applications; Calls to US Trustee, lead counsel, and former independent member of Fee Committee re updates regarding interim fee app procedure	0.50	175.00	JDG
Fee/Employment Applications; Prepared email memo re calls to US Trustee, lead counsel, and former independent member of Fee Committee re updates regarding interim fee app procedure	0.20	70.00	JDG
Avoidance Action Litigation; Review of email from lead counsel regarding interim fee applications	0.10	35.00	JDG
Avoidance Action Litigation; Review and analysis of relevant news articles regarding JP morgan suit	0.30	105.00	JDG
Avoidance Action Litigation; begin to draft discovery to Issuers	5.40	1,350.00	AHC
Avoidance Action Litigation; o/cs w/WFD, AMB re: discovery	0.10	25.00	AHC
Avoidance Action Litigation; research re: service of process on Trust in federal court	0.40	100.00	AHC
Avoidance Action Litigation; verify emails/addresses on Epiq service list and email to Epiq re: corrections to same	0.50	125.00	AHC
Avoidance Action Litigation; Proof and edit email	0.10	11.00	MEB

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Dec-08-10	Avoidance Action Litigation: Review recent emails re: carve-out for Pyxis	0.20	119.00	WAM
	Avoidance Action Litigation; Multiple emails to/from RRR and L. McMurray re: side letter on ADR follow ups	0.90	495.00	JNL
	Avoidance Action Litigation; Review issuer discovery	0.50	275.00	WFD
	Avoidance Action Litigation; O/c w/AMB, RRR	0.20	110.00	WFD
	Avoidance Action Litigation; Prep of discovery for Issuers	3.50	1,382.50	AMB
	Avoidance Action Litigation; Review Objection to ADR Motion	0.30	118.50	AMB
	Avoidance Action Litigation; Review email from J. Bizuela re: VOX Place CDO Limited	0.10	39.50	AMB
	Avoidance Action Litigation; O/cs w/AHC re: prep of discovery for Issuers	0.40	158.00	AMB
	Avoidance Action Litigation; O/cs w/AMB re: serving discovery	0.20	99.00	MCL
	Avoidance Action Litigation; Email exchanges re: objections to Motion for Entry of SPV	0.20	99.00	MCL
	Derivative Counter party ADR Procedures			
	Avoidance Action Litigation; Review email correspondence re: side letters re: SPV	0.30	148.50	MCL
	Derivatives Counter party ADR motion			
	Avoidance Action Litigation; draft, review and edit Issuer discovery	5.00	1,250.00	AHC
	Avoidance Action Litigation; pull objections to ADR proposals from docket	0.20	50.00	AHC
	Avoidance Action Litigation; Proof and edit email; print docs per AHC; save Affidavits of Service to system	0.40	44.00	MEB
Dec-09-10	Avoidance Action Litigation: Review recent emails re: Pyxis carve-out and o/c w/RRR re: same	0.30	178.50	WAM
	Avoidance Action Litigation; Review SPV ADR motion	1.00	615.00	PRD
	Avoidance Action Litigation; T/c, emails w/Mayer Brown re: applicability of ADR carve-out agmt to latest ADR motion re: SPV issues; review letters re: same	0.30	165.00	RRR
	Avoidance Action Litigation; Emails from JDG re: 6th interim fee app requirements and waiver	0.20	110.00	JNL
	Avoidance Action Litigation; Attn to issuer discovery/service	0.40	220.00	WFD
	Avoidance Action Litigation; O/c w/AMB	0.20	110.00	WFD
	Avoidance Action Litigation; T/c w/BNY's counsel and MCL re: discovery extension	0.20	79.00	AMB

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	Avoidance Action Litigation; Review Noteholder's objection to motion authorizing Debtor to implement ADR procedures	0.40	158.00	AMB
	Avoidance Action Litigation; Review email from MCL re: Objections to Motions Authorizing debtor to implement ADR Procedures	0.10	39.50	AMB
	Avoidance Action Litigation; T/c w/Process Server in MD re: service of Process on Wells Fargo	0.30	118.50	AMB
	Avoidance Action Litigation; Prep of discovery re: Issuers	1.00	395.00	AMB
	Avoidance Action Litigation; T/c w/counsel for Bank of America, AMB re: extension on deadline for discovery	0.30	148.50	MCL
	Avoidance Action Litigation; Internal email exchanges re: Bank of America request for extension	0.20	99.00	MCL
	Avoidance Action Litigation; Review objections to motion for entry of SPV Derivatives Counterparty ADR Procedures	2.20	1,089.00	MCL
	Avoidance Action Litigation; o/cs w/AMB re: filing of affidavits of service of pleadings	0.10	25.00	AHC
	Avoidance Action Litigation; provide order re ADR procedures to MCL	0.10	25.00	AHC
	Avoidance Action Litigation; e-file affidavits of service of pleadings	0.30	75.00	AHC
	Avoidance Action Litigation; Save revised Affidavit of Service to system; mark up Affidavit of Service for Deutsche Bank and email to process server requesting revisions be made	0.20	22.00	MEB
Dec-10-10	Avoidance Action Litigation: Review emails re: BOA's counsel's contact re: Pyxis	0.10	59.50	WAM
	Avoidance Action Litigation; Review certain objections filed in opposition to motion re: ADR procedures re: SPVs; o/c w/MCL re: same, issues to be addressed in Debtors' reply brief	1.30	715.00	RRR
	Avoidance Action Litigation; Call from M. Johnson re: service of documents as counsel on behalf of BOA	0.40	220.00	JNL
	Avoidance Action Litigation; Emails and review and respond to emails from RRR, MCL re: BOA counsel request for docs	1.00	550.00	JNL
	Avoidance Action Litigation; ADR matter; side letters; objections to ADR motion	0.50	275.00	JNL
	Avoidance Action Litigation; Begin review of ADR matter objections	1.30	715.00	JNL

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	Avoidance Action Litigation; Attn to BNY seeking extension	0.40	220.00	WFD
	Avoidance Action Litigation; Service of issuer discovery	0.40	220.00	WFD
	Avoidance Action Litigation; Prep of discovery for issuers; emails to/from MCL and AHC re: courtesy copy of discovery to BoA's counsel	3.50	1,382.50	AMB
	Avoidance Action Litigation; Emails from MCL, RRR, WFD re: service of process and extension of time to serve discovery on BNY	0.10	39.50	AMB
	Avoidance Action Litigation; T/c w/MCL and counsel for BNY re: service of process and extension of time to serve discovery	0.30	118.50	AMB
	Avoidance Action Litigation; Email to/from AHC re: creating list of note holders to be added to Complaint	0.10	39.50	AMB
	Avoidance Action Litigation; Internal communications re: motion for entry of SPV Derivatives Counter party ADR Procedures	0.50	247.50	MCL
	Avoidance Action Litigation; Review email from Bank of America re: request for extension on discovery responses; Internal email exchanges re: same	0.40	198.00	MCL
	Fee/Employment Applications; Calls to and from lead counsel re fee applications	0.10	35.00	JDG
	Avoidance Action Litigation; Review and print docs	0.10	11.00	MEB
Dec-13-10	Avoidance Action Litigation; Review and respond to ,multiple emails re: ADR procedures motion and subsequent adjournment	0.70	385.00	JNL
	Avoidance Action Litigation; O/c w/team re: request from DTC, strategy re: BNY	0.40	220.00	WFD
	Avoidance Action Litigation; Revise discovery demands to issuers and update service list	1.50	592.50	AMB
	Avoidance Action Litigation; Review emails from MCL and WFD re: t/cs w/DTC's counsel and BNY Mellon's counsel	0.10	39.50	AMB
	Avoidance Action Litigation; T/c w/DTC's counsel and MCL re: Subpoena to DTC	0.20	79.00	AMB
	Avoidance Action Litigation; Review email from RRR re: amending service list	0.10	39.50	AMB
	Avoidance Action Litigation; T/c w/L. Elbaum (Proskauer), AMB re: DTC subpoena	0.30	148.50	MCL
	Avoidance Action Litigation; Email exchanges re: DTC subpoena	0.20	99.00	MCL
	Avoidance Action Litigation; o/c w/AMB re: Issuer discovery	0.10	25.00	AHC

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Dec-14-10	Avoidance Action Litigation; Print, clip and place sign flags on Plaintiff's First Request for the Production of Documents and Notice of 30(b)(6) Deposition, for all Issuers; prep same	2.60	286.00	MEB
	Avoidance Action Litigation: Emails to/from RRR re: discovery and communication w/client re: same	0.10	59.50	WAM
	Avoidance Action Litigation; Review draft discovery to Issuers and email same to L. McMurray w/explanation	0.30	165.00	RRR
	Avoidance Action Litigation; Review emails from team re: BNY's requested discovery extension and email to L. McMurray re: same	0.30	165.00	RRR
	Claims Administration and Objections; Review November billing and prep for invoice	0.50	275.00	JNL
	Avoidance Action Litigation; O/c w/RRR/AMB re: issuer discovery, BNY issues	0.50	275.00	WFD
	Avoidance Action Litigation; Attn to client emails re: same	0.10	55.00	WFD
	Avoidance Action Litigation; Review emails from RRR to Locke re: Second waive of discovery	0.10	39.50	AMB
	Avoidance Action Litigation; Revise discovery re: Issuers	0.80	316.00	AMB
	Avoidance Action Litigation: Review Notice of Appearance and pro hac vice papers received from Alston & Bird and Affidavit of Service from Absolute Litigation Services, scan and save same on the system and email same to the team	0.50	60.00	KLS
Dec-15-10	Avoidance Action Litigation: Review emails between RRR and McMurray re: discovery requests	0.10	59.50	WAM
	Avoidance Action Litigation: Review emails between WFD and Paul Weiss re: Citibank, and from MCL re: same	0.10	59.50	WAM
	Avoidance Action Litigation; O/c w/WAM, WFD re: status of discovery efforts, related matters	0.20	110.00	RRR
	Avoidance Action Litigation; Attn to finalize issuer discovery	0.90	495.00	WFD
	Avoidance Action Litigation; Emails re: requests for adjournment	0.40	220.00	WFD
	Avoidance Action Litigation; Review email from RRR to L. McMurray re: BNY's request for extension of time to answer	0.10	39.50	AMB
	Avoidance Action Litigation; Revise service list	0.50	197.50	AMB
	Avoidance Action Litigation; Continue prep of discovery for issuers	5.00	1,975.00	AMB

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Dec-16-10	Avoidance Action Litigation; O/cs w/AHC and WFD re: discovery	0.30	118.50	AMB
	Avoidance Action Litigation; Review emails from WFD and MCL re: speaking w/Citibank re: discovery requests	0.10	39.50	AMB
	Avoidance Action Litigation; Email to/from MCL and WFD re: returning call to BNY re: request for extension of time to answer	0.10	39.50	AMB
	Avoidance Action Litigation; o/cs w/AMB re: status and next steps re: sending out of discovery to Issuers	0.20	50.00	AHC
	Avoidance Action Litigation; review and edit discovery to Issuers	3.30	825.00	AHC
	Avoidance Action Litigation; Print Request for Production of Docs and 30 (b)(6) final docs for all issuers	1.10	121.00	MSF
	Avoidance Action Litigation; Conf w/AMB re: Phoenix transactions	0.50	275.00	SCB
	Avoidance Action Litigation; O/c w/WFD, MCL, AMB re: status/next steps re: pending requests for extensions re: discovery responses	0.30	165.00	RRR
	Avoidance Action Litigation; Complete execution of issuer discovery	0.80	440.00	WFD
	Avoidance Action Litigation; O/cs w/team re: status, strategy on DTC and other banks	0.80	440.00	WFD
	Avoidance Action Litigation; Emails w/client	0.20	110.00	WFD
	Avoidance Action Litigation; Prep of cover letter for discovery on Issuer	0.30	118.50	AMB
	Avoidance Action Litigation; Emails to/from WFD, RRR, MCL re: conversations w/counsel from BoA, Citi and BNY re: discovery	0.20	79.00	AMB
	Avoidance Action Litigation; Coordination of serving Amended Summons and Amended Complaint on Issuers w/paralegals	1.40	553.00	AMB
	Avoidance Action Litigation; Revise discovery for Issuers	1.00	395.00	AMB
	Avoidance Action Litigation; O/cs w/WFD re: signing discovery for Issuers	0.10	39.50	AMB
	Avoidance Action Litigation; Emails from WFD, RRR and MCL re: setting up mtg to discuss next steps for discovery	0.10	39.50	AMB
	Avoidance Action Litigation; T/cs and emails w/C. Fallon re: service of discovery	0.30	118.50	AMB
	Avoidance Action Litigation; O/c w/RRR, WFD, MCL re: discovery	0.40	158.00	AMB
	Avoidance Action Litigation; Revise service list	0.10	39.50	AMB
	Avoidance Action Litigation; O/c w/RRR, WFD, AMB re: discovery	0.40	198.00	MCL

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	Avoidance Action Litigation; T/cs w/I. DyVeever (Reed Smith) re: discovery on BNY	0.50	247.50	MCL
	Avoidance Action Litigation; T/c w/M. Johnson (Alston & Bird) re: discovery on B of A	0.30	148.50	MCL
	Avoidance Action Litigation; Internal email exchanges re: discovery.	0.80	396.00	MCL
	Avoidance Action Litigation; Draft email to L. McMurray re: status of discovery	0.20	99.00	MCL
	Avoidance Action Litigation finalize discovery to Issuers	4.00	1,000.00	AHC
	Avoidance Action Litigation; o/cs w/AMB, paralegals re: issuer discovery	0.20	50.00	AHC
	Avoidance Action Litigation; review Lehman service list	0.10	25.00	AHC
	Avoidance Action Litigation; Prep and send Amended Summons and Amended Complaint to 37 recipients via certified mail, return receipt requested, including checking of completed Certified Mail Receipts and Return Receipts, and trip to late-closing post office	5.80	638.00	MEB
	Avoidance Action Litigation; Prepare mailing; o/cs w/AMB, KD, and MEB re: same	1.20	132.00	NFG
	Avoidance Action Litigation; Circulate signature pages	1.40	154.00	MSF
	Avoidance Action Litigation; Review and finalize certified mail slips for service	0.80	88.00	KJD
Dec-17-10	Avoidance Action Litigation: Emails to/from Weil and WMD team members re: arranging call on certain transactions	0.30	178.50	WAM
	Avoidance Action Litigation: Review emails re: BNY's proposal re: service on UK entity	0.10	59.50	WAM
	Avoidance Action Litigation; Review and respond to multiple emails from WAM re: conference on Pyxis issues	0.40	220.00	JNL
	Avoidance Action Litigation; Email to client re: Citi proposal	0.40	220.00	WFD
	Avoidance Action Litigation; Attn to DTC, Bank of A	0.40	220.00	WFD
	Avoidance Action Litigation; Emails from team	0.20	110.00	WFD
	Avoidance Action Litigation; T/c w/MCL and Citi's counsel re: discovery	0.30	118.50	AMB
	Avoidance Action Litigation; Review spreadsheets to determine which deal Veritas was a noteholder	0.30	118.50	AMB
	Avoidance Action Litigation; Review email from MCL re: Citi's doc production and DTC's doc production	0.10	39.50	AMB

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	Avoidance Action Litigation; Review emails re: coordination of times to discuss Pyxis w/LB and WGM	0.10	39.50	AMB
	Avoidance Action Litigation; Emails to/from C. Fallon re: service of discovery	0.30	118.50	AMB
	Avoidance Action Litigation; Review email from WFD and L. McMurray re: BNY accepting service	0.10	39.50	AMB
	Avoidance Action Litigation; T/c w/L. Elbaum (Proskauer) re: DTC response to subpoena	0.40	198.00	MCL
	Avoidance Action Litigation; Draft email to L. Elbaum (Proskauer) confirming agmt re: DTC response to subpoena.	0.20	99.00	MCL
	Avoidance Action Litigation; T/c w/C. Hammerman (Paul Weiss) re: Citibank response to discovery requests	0.30	148.50	MCL
	Avoidance Action Litigation; Draft email memo to WFD re: update on negotiations re: response to discovery	0.50	247.50	MCL
	Avoidance Action Litigation; Review email correspondence re: conf call re: Pyxis	0.20	99.00	MCL
	Avoidance Action Litigation; Internal email exchanges re: discovery	0.40	198.00	MCL
	Avoidance Action Litigation; review service list and check docket for same	0.20	50.00	AHC
	Avoidance Action Litigation; spot check issuer discovery sent to Epiq	0.70	175.00	AHC
	Avoidance Action Litigation; Prep Affidavits of Service for 36 of the 37 recipients who were sent docs via certified mail on 12/16/10; re-send docs to one of the recipients, including trip to post office, and prep Affidavit of Service for that recipient	3.70	407.00	MEB
Dec-20-10	Avoidance Action Litigation: Review recent emails re: discovery issues and status	0.20	119.00	WAM
	Avoidance Action Litigation; Review emails from R. Miler and WAM re: pyxis conference	0.30	165.00	JNL
	Avoidance Action Litigation; Attn to status all Trustees	0.50	275.00	WFD
	Avoidance Action Litigation; O/c w/MCL re: BNY	0.00	0.00	WFD
	Avoidance Action Litigation; Review draft email re: same	0.20	110.00	WFD
	Avoidance Action Litigation; Email to C. Fallon re: affidavit of service for doc demands	0.20	79.00	AMB
	Avoidance Action Litigation; Emails to/from MCL and WFD to I. deVyver re: discovery	0.10	39.50	AMB



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	Avoidance Action Litigation; Review emails from WFD and MCL re: update on discovery schedule for trustees and DTC	0.10	39.50	AMB
	Avoidance Action Litigation; O/cs and emails to/from MCL re: Veritas Capital	0.20	79.00	AMB
	Claims Administration and Objections; Review I. deVyver letter re: BNY response to discovery requests	0.20	99.00	MCL
	Avoidance Action Litigation; Draft and revise response to deVyver letter re: BNY response to discovery requests	0.70	346.50	MCL
	Avoidance Action Litigation; Internal email communications w/WFD, AMB re: de Vyver letter	0.20	99.00	MCL
	Avoidance Action Litigation; Draft email memo re: status of negotiations w/DTC, Trustees re: discovery responses	0.50	247.50	MCL
	Avoidance Action Litigation; T/cs w/AMB re: Veritas Capital	0.30	148.50	MCL
	Avoidance Action Litigation; Internal email exchange w/Lehman team re: Veritas Capital	0.20	99.00	MCL
	Avoidance Action Litigation; Email exchange w/WAM re: 12/21 conf call re: Pyxis	0.20	99.00	MCL
	Avoidance Action Litigation; e-file Deutsche Bank affidavit of service	0.20	50.00	AHC
	Avoidance Action Litigation; Revise Affidavits of Service	1.60	176.00	MEB
Dec-21-10	Avoidance Action Litigation: Review background docs and materials re: Pyxis to prepare for conf call today	1.00	595.00	WAM
	Avoidance Action Litigation: Conf call w/client, Weil, Curtis-Mallet and WMD re: Libra and related transactions and Pyxis	1.50	892.50	WAM
	Avoidance Action Litigation: O/c w/MCL and SBC re: status, assignment and next steps re: Pyxis	0.20	119.00	WAM
	Avoidance Action Litigation; conf call w/MCL, WAM, Weil Gotshal, Curtis-Mallet re: Pyxis	1.50	825.00	SCB
	Avoidance Action Litigation; Review Curtis-Mallet memo re: Pyxis	0.50	275.00	SCB
	Avoidance Action Litigation; Attn to BNY issues	0.50	275.00	WFD
	Avoidance Action Litigation; Review MCL email re: status	0.30	165.00	WFD
	Avoidance Action Litigation; O/c w/AMB	0.20	110.00	WFD
	Avoidance Action Litigation; Attn to call from DB	0.20	110.00	WFD
	Avoidance Action Litigation; T/c w/U.S. Bank's counsel re: discovery	0.20	79.00	AMB

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	Avoidance Action Litigation; Review numerous long emails from I. deVyver, MCL and WFD re: discovery dispute	0.20	79.00	AMB
	Avoidance Action Litigation; Revise spreadsheet re: discovery	1.50	592.50	AMB
	Avoidance Action Litigation; Review email from email from I. deVyver (Reed Smith) re: BNY response to discovery requests; draft response to same	0.90	445.50	MCL
	Avoidance Action Litigation; Internal communications re: BNY response to discovery requests	0.40	198.00	MCL
	Avoidance Action Litigation; T/c w/Lehman, Weil Gotshal, Curtis Mallet re: Pyxis arguments	1.80	891.00	MCL
	Avoidance Action Litigation; Review Curtis Mallet memo re: Pyxis arguments	0.80	396.00	MCL
	Avoidance Action Litigation; O/cs w/WAM, SCB re: Curtis Mallet memo	0.30	148.50	MCL
	Avoidance Action Litigation; locate and pull all summary judgment briefs in Libra litigation and email same to MCL	0.90	225.00	AHC
	Avoidance Action Litigation; o/c w/MCL re: Libra litigation	0.10	25.00	AHC
	Avoidance Action Litigation: Notarize 37 Affidavits of Service for 1st Amended Summons and Complaint and Notice of Pre-trial Conference per MEB's request	0.30	36.00	KLS
Dec-22-10	Avoidance Action Litigation; Emails from KS and MCL re: return of service	0.20	110.00	JNL
	Avoidance Action Litigation; Review email from WAM re: Pyxis conf. call	0.10	55.00	JNL
	Avoidance Action Litigation; Attn to issues on Trustee disc responses	0.20	110.00	WFD
	Avoidance Action Litigation; Service on issuers	0.20	110.00	WFD
	Avoidance Action Litigation; O/c w/AMB, MCL	0.20	110.00	WFD
	Avoidance Action Litigation; Review emails from WFD and MCL re: t/c w/counsel for Deutsche Bank	0.10	39.50	AMB
	Avoidance Action Litigation; Review docs from CT Corp and o/cs w/team re: same	1.10	434.50	AMB
	Avoidance Action Litigation; Review draft email from MCL to counsel for BNY re: discovery requests	0.10	39.50	AMB
	Avoidance Action Litigation; Emails to/from KLS re: service of process on Issuers	0.10	39.50	AMB
	Avoidance Action Litigation; Email to WFD re: t/c w/US Bank re: discovery	0.40	158.00	AMB

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	Avoidance Action Litigation; Email to Citi confirming t/c conversation re: discovery	0.50	197.50	AMB
	Avoidance Action Litigation; T/c w/MCL and counsel from Citi re: discovery requests	0.20	79.00	AMB
	Avoidance Action Litigation; O/cs w/MCL and AHC re: serving process on issuers	0.20	79.00	AMB
	Avoidance Action Litigation; T/c w/MCL and counsel for BNY re: discovery requests	0.30	118.50	AMB
	Avoidance Action Litigation; T/c w/MCL and counsel for Deutsche Bank re: discovery requests	0.20	79.00	AMB
	Avoidance Action Litigation; Review email from MCL summarizing call w/Deutsche Bank	0.10	39.50	AMB
	Avoidance Action Litigation; T/c w/R. Pedone re: DB response to discovery	0.20	99.00	MCL
	Avoidance Action Litigation; T/c w/I. DeVyver re: BNY response to discovery	0.40	198.00	MCL
	Avoidance Action Litigation; Draft email to I. DeVyver memorializing agmt	0.50	247.50	MCL
	Avoidance Action Litigation; Internal communications re: service on Issuers	0.50	247.50	MCL
	Avoidance Action Litigation; Internal communications re: Trustees' response to discovery requests	1.30	643.50	MCL
	Avoidance Action Litigation; o/c w/AMB re: next steps in discovery and service of pleadings	0.10	25.00	AHC
	Avoidance Action Litigation; o/c w/KLS re: organization of docs received from CT Corp	0.10	25.00	AHC
	Avoidance Action Litigation: Review pleadings and discovery docs returned by CT Corp for invalid service on various entities, send detailed email to team re: same and emails and o/cs w/MCL re: same	0.40	48.00	KLS
	Avoidance Action Litigation: O/cs w/AHC and AMB re: keeping track of docs returned by CT Corp and creating chart re: same	0.20	24.00	KLS
	Avoidance Action Litigation: Review pleadings and discovery docs returned by CT Corp, update chart re: service of same and organize, label and file same per AMB's request	1.50	180.00	KLS
Dec-23-10	Avoidance Action Litigation: Review letter from US Bank re: discovery requests	0.10	59.50	WAM
	Avoidance Action Litigation; Review Pyxis transaction docs	1.00	550.00	SCB
	Avoidance Action Litigation; Review NOA & Corp Ownership statement by Barclays in SPE Avoidance lit	0.20	110.00	JNL

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Avoidance Action Litigation; Meeting with JDG re: missing check	0.30	165.00	JNL
Avoidance Action Litigation; Review and respond to emails from WAM re: missing check for 1st month payment	0.30	165.00	JNL
Avoidance Action Litigation; Review F. Top email re: US Bank discovery response	0.10	55.00	JNL
Avoidance Action Litigation; Attn to negotiation of Trustee response times	0.40	220.00	WFD
Avoidance Action Litigation; O/cs w/AMB, MCL	0.30	165.00	WFD
Avoidance Action Litigation; Review draft confirm emails	0.20	110.00	WFD
Avoidance Action Litigation; Attn to issue on service of Issuers	0.20	110.00	WFD
Avoidance Action Litigation; O/c w/AMB re: same	0.10	55.00	WFD
Avoidance Action Litigation; Prep of confirming email to Citi's counsel re: discovery	0.30	118.50	AMB
Avoidance Action Litigation; Update discovery spreadsheet	0.10	39.50	AMB
Avoidance Action Litigation; Review draft email from MCL re: update to L. McMurray re: discovery	0.10	39.50	AMB
Avoidance Action Litigation; Review update on BoA discovery	0.10	39.50	AMB
Avoidance Action Litigation; Email to/from WFD re: strategy re: serving Issuers	0.10	39.50	AMB
Avoidance Action Litigation; Attn to strategy re: serving Issuers	0.40	158.00	AMB
Avoidance Action Litigation; T/c w/M. Johnson re: BofA response to discovery	0.40	198.00	MCL
Avoidance Action Litigation; Draft email to M. Johnson memorializing agmt	0.50	247.50	MCL
Avoidance Action Litigation; Prep draft email to L. McMurray summarizing status of discovery; review correspondence re: same	0.80	396.00	MCL
Avoidance Action Litigation: Review new returned discovery docs received from CT Corp by FedEx, send email to AMB, MCL and AHC re: same	0.10	12.00	KLS
Avoidance Action Litigation: Update discovery/pleadings service chart w/info on docs returned by CT Corp today and label and file same	0.40	48.00	KLS
Dec-27-10 Avoidance Action Litigation; Attn to emails on discovery response status	0.20	110.00	WFD

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	Avoidance Action Litigation; Prep of confirming letter to F. Top re: U.S.Bank	0.40	158.00	AMB
	Avoidance Action Litigation; Review email from I. deVyver re: agmt re: discovery	0.10	39.50	AMB
	Avoidance Action Litigation; Email exchange w/R. Pedone re: DB response to discovery	0.20	99.00	MCL
	Avoidance Action Litigation; Proof and edit email	0.10	11.00	MEB
Dec-28-10	Avoidance Action Litigation: Review recent emails re: discovery status	0.10	59.50	WAM
	Avoidance Action Litigation: Review email from Curtis-Mallet re: Pyxis docs	0.10	59.50	WAM
	Avoidance Action Litigation; Conf w/MCL re: Pyxis key issues	1.30	715.00	SCB
	Avoidance Action Litigation; Review Pyxis underlying docs	4.20	2,310.00	SCB
	Avoidance Action Litigation; Attn to email to client re: status	0.30	165.00	WFD
	Avoidance Action Litigation; Attn to next steps	0.30	165.00	WFD
	Avoidance Action Litigation; O/c w/MCL re: next steps for discovery	0.30	118.50	AMB
	Avoidance Action Litigation; Review emails from WFD, MCL and L.McMurray re: discovery update	0.10	39.50	AMB
	Avoidance Action Litigation; T/c w/S. Namnum re: obtaining Pyxis correspondence	0.20	99.00	MCL
	Avoidance Action Litigation; Review fall 2008 Pyxis correspondence, indenture and other deal docs	2.00	990.00	MCL
	Avoidance Action Litigation; T/c w/R. Pedone re: DB response to discovery	0.30	148.50	MCL
	Avoidance Action Litigation; Draft email to R. Pedone memorializing agmt re: response to discovery	0.20	99.00	MCL
	Avoidance Action Litigation; Revise email to L. McMurray summary of discovery status	0.30	148.50	MCL
	Fee/Employment Applications; Review of email from former fee committee representative regarding new service addresses for fee committee	0.10	35.00	JDG
	Avoidance Action Litigation: Review email and o/c w/MCL re: assignments re: creating Pyxis binders for team	0.30	36.00	KLS
	Avoidance Action Litigation: Print out lengthy Pyxis deal docs and correspondence and organize same into binders, create index for same, label same and distribute copies to	2.80	336.00	KLS

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	WAM, MCL, SCB and two copies to the file per MCL's request			
Dec-29-10	Avoidance Action Litigation: Emails to/from MCL re: Pyxis docs	0.10	59.50	WAM
	Avoidance Action Litigation; Working group mtg re: noteholder discovery issues	0.70	385.00	SCB
	Avoidance Action Litigation; Meet w/team re: status/next steps re: various discovery efforts in SPV Distributed class action	1.20	660.00	RRR
	Fee/Employment Applications; Finish review of fee app bills and draft 2d Monthly fee app	2.00	1,100.00	JNL
	Fee/Employment Applications; Revise 2d Monthly fee app	1.00	550.00	JNL
	Avoidance Action Litigation; Attn to service issues	0.50	275.00	WFD
	Avoidance Action Litigation; O/c w/ team re: service issues	0.70	385.00	WFD
	Avoidance Action Litigation; O/c w/ team re: service issues	0.70	385.00	WFD
	Avoidance Action Litigation; Long o/c w/WFD, RRR, SCB, MCL and AHC re: discovery	1.20	474.00	AMB
	Avoidance Action Litigation; Review notice from Crt re: Notice of Appearance	0.10	39.50	AMB
	Avoidance Action Litigation; Review email from MCL and WFD re: BoA's concern re: confidentiality	0.10	39.50	AMB
	Avoidance Action Litigation; Revise to do list	0.30	118.50	AMB
	Avoidance Action Litigation; Review notice from court re: Notice of Appearance	0.10	39.50	AMB
	Avoidance Action Litigation; O/c w/ re: next steps re: service and discovery	0.80	396.00	MCL
	Avoidance Action Litigation; T/c w/A. Lorenzo re: BoA response to discovery, confidentiality; sent order permitting LBSF to take to discovery to Lorenzo	0.30	148.50	MCL
	Avoidance Action Litigation; confirm co-issuers on DE state website	0.20	50.00	AHC
	Avoidance Action Litigation; meeting w/team re: discovery	0.90	225.00	AHC
Dec-30-10	Avoidance Action Litigation: Review emails re: B of A response to discovery requests, and briefly review response	0.20	119.00	WAM
	Avoidance Action Litigation; O/c w/MCL re: new assignment for Pyxis arguments, next steps	0.10	55.00	RRR
	Fee/Employment Applications; Additional drafting of narrative for Nov. Monthly invoice	1.30	715.00	JNL

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Fee/Employment Applications; Finalize Nov. Monthly Invoice fee application	0.60	330.00	JNL
Fee/Employment Applications; Draft letter to fee committee re same	0.20	110.00	JNL
Fee/Employment Applications; O/c JDG re: Fee Committee changes	0.30	165.00	JNL
Avoidance Action Litigation; Attn to emails re: productions/status	0.40	220.00	WFD
Avoidance Action Litigation; T/cs w/C. Laforge from LLS and MCL re: service of process	0.80	316.00	AMB
Avoidance Action Litigation; Review to-do-list circulated by AHC and edit same	0.10	39.50	AMB
Avoidance Action Litigation; Emails from MCL and RRR re: Mizuho re: note holder	0.10	39.50	AMB
Avoidance Action Litigation; Review BofA response to discovery requests	0.30	148.50	MCL
Avoidance Action Litigation; Review Citibank response to discovery requests, docs	0.80	396.00	MCL
Avoidance Action Litigation; T/c w/W. Clareman re: Citi response to discovery requests	0.30	148.50	MCL
Avoidance Action Litigation; Internal email exchanges re: responses to discovery	0.80	396.00	MCL
Avoidance Action Litigation; review, update and send to do list for discovery to team	0.50	125.00	AHC
Avoidance Action Litigation; o/cs w/AMB, MEF re: service of issuer pleadings	0.50	125.00	AHC
Avoidance Action Litigation; Print Amended Compl. and Summons for service to co-issuers; Verify agent addresses; Mail Amended Compl. and Summons to All co-issuers	5.70	627.00	MSF

MATTER TOTALS:	196.70	\$76,865.00	
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MATTER: 4715-003

RE: Koch Avoidance Litigation

Dec-01-10	Avoidance Action Litigation: Review emails w/WMD attorney comments on draft ADR Notices	0.10	59.50	WAM
	Avoidance Action Litigation: O/c w/RRR re: status and contacting Orrick re: Koch issues	0.20	119.00	WAM
	Avoidance Action Litigation: Conf call w/RRR, MCL and Guy's office of Orrick re: Koch issues	0.10	59.50	WAM

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	Avoidance Action Litigation: Review email from Orrick re: responding to our inquiry re Koch, and forward to client	0.10	59.50	WAM
	Avoidance Action Litigation; Review draft ADR Notices; underlying ISDA docs	0.60	330.00	SCB
	Avoidance Action Litigation; Review emails form RRR and respond to same re: Koch ADR notices	0.40	220.00	JNL
	Avoidance Action Litigation; Review Koch ADR Notices; review ADR notice procedure	0.80	440.00	JNL
	Avoidance Action Litigation; T/c w/WAM, RRR, CIBC counsel re: SPV Derivatives ADR motion	0.20	99.00	MCL
Dec-02-10	Avoidance Action Litigation: T/c w/RRR re: Koch issues and next steps	0.10	59.50	WAM
Dec-06-10	Avoidance Action Litigation: Review emails between RRR and Wolk re: communications w/Orrick re: Koch	0.30	178.50	WAM
	Avoidance Action Litigation: Emails to/from RRR re: contacting Orrick re: Koch and next steps, and review emails between RRR and Guy re: same, and voice mail re: same	0.30	178.50	WAM
	Avoidance Action Litigation; Conf call w/JNL, MCL re: client addition of 365(e) argument to S&T ADR Notice and attn to next steps re: same; t/c w/J. Guy re: status of Koch response re: mediating; review email from J. Guy re: same; prep proposed reply and forward to I. Wolk; conf call w/I. Wolk, JNL, MCL re: same and next steps w/Koch, 365(e) argument; follow-up t/c w/J. Guy, MCL; email to I. Wolk re: same	2.30	1,265.00	RRR
	Avoidance Action Litigation; Emails to/from RRR, I. Wolk re: Koch ADR notice	1.20	660.00	JNL
	Avoidance Action Litigation; Prep for conf. call with RRR, I Wolk re: ADR notices and potential issues regarding setoff argument	0.80	440.00	JNL
	Avoidance Action Litigation; Conf. Call with RRR, MCL, I Wolk re ADR notices	0.50	275.00	JNL
	Avoidance Action Litigation; O/c w/I. Wolk, RRR, JNL re: Koch issues, mediation	0.40	198.00	MCL
	Avoidance Action Litigation; O/c w/J. Guy, RRR re: Koch issues, mediation	0.30	148.50	MCL
Dec-07-10	Avoidance Action Litigation: Review emails between RRR and clients re: Koch issues	0.20	119.00	WAM
	Avoidance Action Litigation: Review email from RRR to Guy of Orrick re: Koch issues and scheduling	0.10	59.50	WAM



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	Avoidance Action Litigation; Finalize/send email to J. Guy responding re: next steps for amendment of Tolling Agmt and mediation	0.30	165.00	RRR
	Avoidance Action Litigation; Review emails from I Wolk and RRR re: ADR notices and comments from various parties/meetings	1.00	550.00	JNL
Dec-08-10	Avoidance Action Litigation: Review emails from Solinger and Wolk re: Koch	0.10	59.50	WAM
	Avoidance Action Litigation; Review emails from RRR and S. Collings re: ADR notices and Pyxis side letters	5.00	2,750.00	JNL
	Avoidance Action Litigation; Review email correspondence re: Koch ADR notices	0.30	148.50	MCL
Dec-09-10	Avoidance Action Litigation: Review recent emails re: Koch amendment to tolling agreement, and finalizing draft ADR notices	0.20	119.00	WAM
	Avoidance Action Litigation; Review derivatives ADR order and summarized procedure	1.00	495.00	MCL
Dec-14-10	Avoidance Action Litigation: Review recent emails re: Koch ADR notices and amended tolling agmt	0.20	119.00	WAM
	Avoidance Action Litigation; Review emails and responses from RRR re: tolling agreement and draft ADR notices	0.70	385.00	JNL
Dec-15-10	Avoidance Action Litigation: Review email from Guy of Orrick re: execution of tolling agmt	0.10	59.50	WAM
	Avoidance Action Litigation; T/c w/A. Azer re: status of Committee review of Koch ADR Notices and follow-up email w/Azer re: same	0.10	55.00	RRR
	Avoidance Action Litigation; Emails to/from J. Guy re: status of Koch execution of Amendment to Tolling Agmt, payment instructions	0.20	110.00	RRR
Dec-16-10	Avoidance Action Litigation: Review RRR email to Orrick re: tolling agmt	0.10	59.50	WAM
	Avoidance Action Litigation: Review emails between RRR and client, and others, re: ADR notices and Creditors' committee's views re: same, and o/c w/RRR re: same	0.40	238.00	WAM
	Avoidance Action Litigation; Attn to draft email to J. Guy re: timetable for mediation w/Koch	0.10	55.00	RRR
	Avoidance Action Litigation; T/c w/A. Azer (Milbank) re: ADR notices	0.20	99.00	MCL
	Avoidance Action Litigation; Email correspondence re: Committee's comments on ADR notices	0.30	148.50	MCL

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Dec-17-10	Avoidance Action Litigation: Review email from Guy re: signed tolling agmt and forward to Lehman w/cover note	0.10	59.50	WAM
	Avoidance Action Litigation: Save copy of Amendment to Tolling Agmt signed by Koch on the system per WAM's request	0.10	12.00	KLS
Dec-30-10	Avoidance Action Litigation; O/c w/MCL re: status of finalizing ADR Notices w/Committee	0.10	55.00	RRR
	MATTER TOTALS:	19.60	\$10,710.00	
MATTER:	4715-002			
RE:	Goldman Sachs Claims Dispute			
Dec-01-10	Claims Administration and Objections: T/c w/Lafaire re: recent developments and status of Goldman Sachs dispute	0.20	119.00	WAM
	Claims Administration and Objections: Send email to WMD team on update of Goldman Sachs dispute	0.30	178.50	WAM
	Claims Administration and Objections; Review WAM email re: status of Goldman close out dispute	0.10	55.00	JNL
	MATTER TOTALS:	0.60	\$352.50	
MATTER:	4715-004			
RE:	CEAGO Avoidance Action			
Dec-01-10	Avoidance Action Litigation: O/c w/RRR re: draft stay application, status and next steps	0.20	119.00	WAM
	Avoidance Action Litigation: Review emails between WMD and clients re: CEAGO motion for stay	0.20	119.00	WAM
	Avoidance Action Litigation: Conf call w/RRR, MCL and Fife's office re: inquiry from White & Case representing ad hoc group of Lehman creditors	0.10	59.50	WAM
	Avoidance Action Litigation: Conf call w/Fife and RRR re: inquiry from White & Case representing ad hoc group of Lehman creditors, and Lehman general approach to same, and o/c and t/c w/RRR thereafter re: follow-up	0.30	178.50	WAM
	Avoidance Action Litigation: Review emails between RRR and Curtis Mallet re: inquiry from White & Case representing ad hoc group of Lehman creditors	0.20	119.00	WAM

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Dec-02-10	Avoidance Action Litigation: Send email to White & Case re: responding to its inquiry from ad hoc group of Lehman creditors	0.10	59.50	WAM
	Avoidance Action Litigation: Review CEAGO complaint and draft motion to stay avoidance action re: CEAGO	0.40	238.00	WAM
	Avoidance Action Litigation; Review/markup revised draft of motion for stay; finalize/circulate same	1.00	550.00	RRR
	Avoidance Action Litigation; Conf call w/L. Fife re: email from Ad Hoc creditor group and follow up email to Curtis-Mallet re: same, next steps	0.20	110.00	RRR
	Avoidance Action Litigation; Review email to WAM from Ad Hoc Creditors and WAM response re: CEAGO complaint	0.20	110.00	JNL
	Avoidance Action Litigation; Revise stay motion	0.80	396.00	MCL
	Avoidance Action Litigation; Internal communication w/RRR re: stay motion	0.30	148.50	MCL
	Avoidance Action Litigation; Review email communication w/client re: stay motion	0.20	99.00	MCL
	Avoidance Action Litigation: Review recent emails re: responding to White & Case's request for discussion with ad hoc group of Lehman creditors	0.20	119.00	WAM
	Avoidance Action Litigation: Review emails re: CEAGO stay motion	0.20	119.00	WAM
	Avoidance Action Litigation: T/cs w/RRR re: responding to White & Case's request for discussion with ad hoc group of Lehman creditors, CEAGO stay motion and next steps	0.20	119.00	WAM
	Avoidance Action Litigation: Review emails between RRR, Weil and client re: CEAGO stay issue and filing notice of stay	0.20	119.00	WAM
	Avoidance Action Litigation; T/c w/T. Smith re: status, inquiry from Ad Hoc Creditors group, next steps; review follow-up emails re: same	0.30	165.00	RRR
	Avoidance Action Litigation; Attn to finalizing/filing of motion to stay; conf w/client, Weil, colleagues re: same, alternative notice of stay	1.70	935.00	RRR
	Avoidance Action Litigation; Review and respond to multiple emails from RRR, L. McMurray, MCL re: motion for stay	1.60	880.00	JNL
	Avoidance Action Litigation; Internal communications re: motion for stay/notice of stay order	1.00	495.00	MCL
	Avoidance Action Litigation; T/cs w/WGM re: motion for stay/notice of stay order	0.30	148.50	MCL

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	Avoidance Action Litigation; Email communications w/L. McMurray, WMD team. WGM re: stay motion/notice of stay order	0.70	346.50	MCL
	Avoidance Action Litigation; Draft, revise and file notice of stay order	0.80	396.00	MCL
	Avoidance Action Litigation; filing of notice of entry	0.30	75.00	AHC
Dec-03-10	Avoidance Action Litigation: Review recent emails among WMD, Weil, Curtis-Mallet and client re: responding to White & Case and communications w/ad hoc committee of Lehman creditors	0.20	119.00	WAM
	Avoidance Action Litigation; Emails from MCL and RRR RE: Ceago stay matters	1.10	605.00	JNL
	Avoidance Action Litigation; Review email correspondence re: mtg w/Ad Hoc Creditor Group	0.30	148.50	MCL
Dec-06-10	Avoidance Action Litigation: Review recent emails re: conf call w/White & Case representing ad hoc committee of Lehman creditors	0.10	59.50	WAM
Dec-07-10	Avoidance Action Litigation: Review recent emails re: arranging and then postponing call w/White & Case re: ad hoc committee of Lehman creditors	0.10	59.50	WAM
Dec-08-10	Avoidance Action Litigation: Review recent emails	0.10	59.50	WAM
	Avoidance Action Litigation; Review emails from RRR and S. Collings re: ADR notices and Ceago side letters	0.20	110.00	JNL
Dec-11-10	Avoidance Action Litigation; Review multiple objections to motion to implement ADR and being outline of response	5.00	2,750.00	JNL
Dec-14-10	Avoidance Action Litigation: Review Notice of Appearance and pro hac vice papers from Alston & Bird, scan and save same on the system and email same to the team	0.30	36.00	KLS
Dec-28-10	Avoidance Action Litigation; O/c w/SCB re: Pyxis arguments	0.80	396.00	MCL
	MATTER TOTALS:	19.90	\$10,566.00	
		1		
	Totals	236.80	\$98,493.50	

# **EXHIBIT B**

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MATTER: **4715-003**

RE: Koch Avoidance Litigation

Jan-28-11 Wire Transfer (~~credit from overcharge on previous invoice~~) 809.73

MATTER: **4715-001**

RE: SPV Avoidance Litigation

	Federal Express Inv #	123.57
	Filing Fee	250.00
	Pacer Service Center Inv#	8.96
	Photocopy Expense	93.70
	Postage Expense	7.85
Oct-25-10	Working Dinner - RRR	20.15
Oct-29-10	Pae Tec Comm. Inv.# 52679872	1.24
	Elite (Car Service) Inv. # 1431248 - KLS (10/22)	67.08
	Elite (Car Service) Inv. # 1431248 - AMB (10/20)	100.00
Oct-31-10	Lexis Nexis Inv. # 1010020410	21.45
	Lexis Nexis Inv. # 1010020410	131.96
Dec-01-10	Demovsky Lawyer Service Inv.# 298116 (11/30)	169.00
	Demovsky Lawyer Service Inv.# 298115 (11/30)	154.00
	Demovsky Lawyer Service Inv.# 298001 (11/30)	154.00
	Demovsky Lawyer Service Inv.# 298002 (11/30)	154.00
	Demovsky Lawyer Service Inv.# 298000 (11/30)	169.00
Dec-03-10	Working Dinner - AMB	17.01
	Elite (Car Service) Inv. # 1435906 - AMB (11/29)	100.00
Dec-10-10	Elite (Car Service) Inv. # 1437033 - AMB (12/6)	100.00
	Elite (Car Service) Inv. # 1437033 - AMB (12/7)	100.00
Dec-17-10	Elite (Car Service) Inv. # 1437824 - AMB (12/14)	100.00
Dec-24-10	Elite (Car Service) Inv. # 1438795 - AMB (12/16)	100.00
	Elite (Car Service) Inv. # 1438795 - AMB (12/20)	100.00
	Elite (Car Service) Inv. # 1438795 - RRR (12/15)	100.00

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	Elite (Car Service) Inv. # 1438795 - KLS (12/22)	67.08		
	Elite (Car Service) Inv. # 1438795 - AMB (12/15)	100.00		
Dec-31-10	Facsimiles 12 @ 1.00	12.00		
	Lexis Nexis Inv. # 1012020346	32.65		
	Working Dinner - AMB (1/4)	14.00		
	Working Dinner - AMB (1/5)	20.00		
	Working Dinner - AMB (1/3)	8.26		
	Working Dinner - AMB (12/21)	14.00		
	MATTER TOTALS:	\$2,610.96		
MATTER:	<b>4715-003</b>			
RE:	Koch Avoidance Litigation			
	Photocopies	24.60		
	MATTER TOTALS:	\$24.60		
MATTER:	<b>4715-002</b>			
RE:	Goldman Sachs Claims Dispute			
Oct-29-10	Elite (Car Service) Inv. # 1431248 - MCL (10/25)	100.00		
	Elite (Car Service) Inv. # 1431248 - AMB (10/26)	100.00		
	Elite (Car Service) Inv. # 1431248 - AMB (10/22)	100.00		
	Elite (Car Service) Inv. # 1431248 - MCL (10/23)	100.00		
Oct-31-10	Lexis Nexis Inv. # 1010020410	1.27		
	Lexis Nexis Inv. # 1010020410	3.22		
	Lexis Nexis Inv. # 1010020410	905.80		
Dec-01-10	Local Travel - JNL	14.00		
Dec-31-10	ALM Invoice # MA11110982	12.60		
	MATTER TOTALS:	\$1,336.89		
MATTER:	<b>4715-004</b>			
RE:	CEAGO Avoidance Action			
	Filing Fee	250.00		
	Pacer Service Center Inv#	0.24		
Oct-25-10	Working Dinner (RRR Working Dinner Overage)	-0.15		
	MATTER TOTALS:	\$250.09		

Invoice #: 20364

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Total

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\$4,222.54